

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AMERICAN ALLIANCE FOR
EQUAL RIGHTS,

Plaintiff,

and

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

v.

KWAME RAOUL, in his official capacity as
Attorney General of the State of Illinois;
JAMES BENNETT, in his official capacity as
Director of the Illinois Department of Human
Rights; and ALEXI GIANNOULIAS, in his
official capacity as Secretary of State of the
State of Illinois.

Defendants.

Case No. 1:25-cv-669

Judge Coleman

**RESPONSE IN OPPOSITION
TO DEFENDANTS' MOTION TO DISMISS**

Illinois' motion to dismiss the Alliance's original complaint, *see* MTD (Doc.56), is moot. The Alliance amended its complaint, *see* Am-Compl. (Doc.59), so no "live dispute" over the original complaint remains. *Rodriguez v. Xerox Bus. Servs., LLC*, 2016 WL 8674378, at *1 (W.D. Tex. June 16); *accord Ayoubi v. Dart*, 2015 WL 1257666, at *1 (N.D. Ill. Mar. 16) (amended complaint "moots a motion to dismiss a prior complaint"); *Daniel v. Cook Cnty.*, 2014 WL 334635, at *3 (N.D. Ill. Jan. 29) (same). This Court appears to agree, as it directed Illinois to "respon[d] to [the Alliance's] amended complaint." Doc.60 at 1; *accord* Doc.66 at 1. And Illinois appears to agree, as it suggested that it was drafting a new motion to dismiss. Doc.64 at 2 ¶5. But in an abundance of caution, the Alliance asks this Court to deny Illinois' motion to dismiss the Alliance's original complaint as moot.

Dated: May 6, 2025

Respectfully submitted,

/s/ Cameron T. Norris

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CERTIFICATE OF SERVICE

I hereby certify on May 6, 2025, a true and correct copy of this document and all related attachments were served electronically by the Court's CM/ECF system to all counsel of record.

/s/ Cameron T. Norris

Counsel for Plaintiff